



Integrity Committee



**The Integrity Committee (IC)
receives its authority pursuant
to Executive Order 12993,
signed in March 1996.**

What is the Integrity Committee?

- **The IC is an interagency committee,**
- **Receives, reviews, and investigates,**
- **Administrative (*non-criminal*) allegations,**
- **Against an IG or senior staff member,**
- **Who is a member of the PCIE or ECIE**

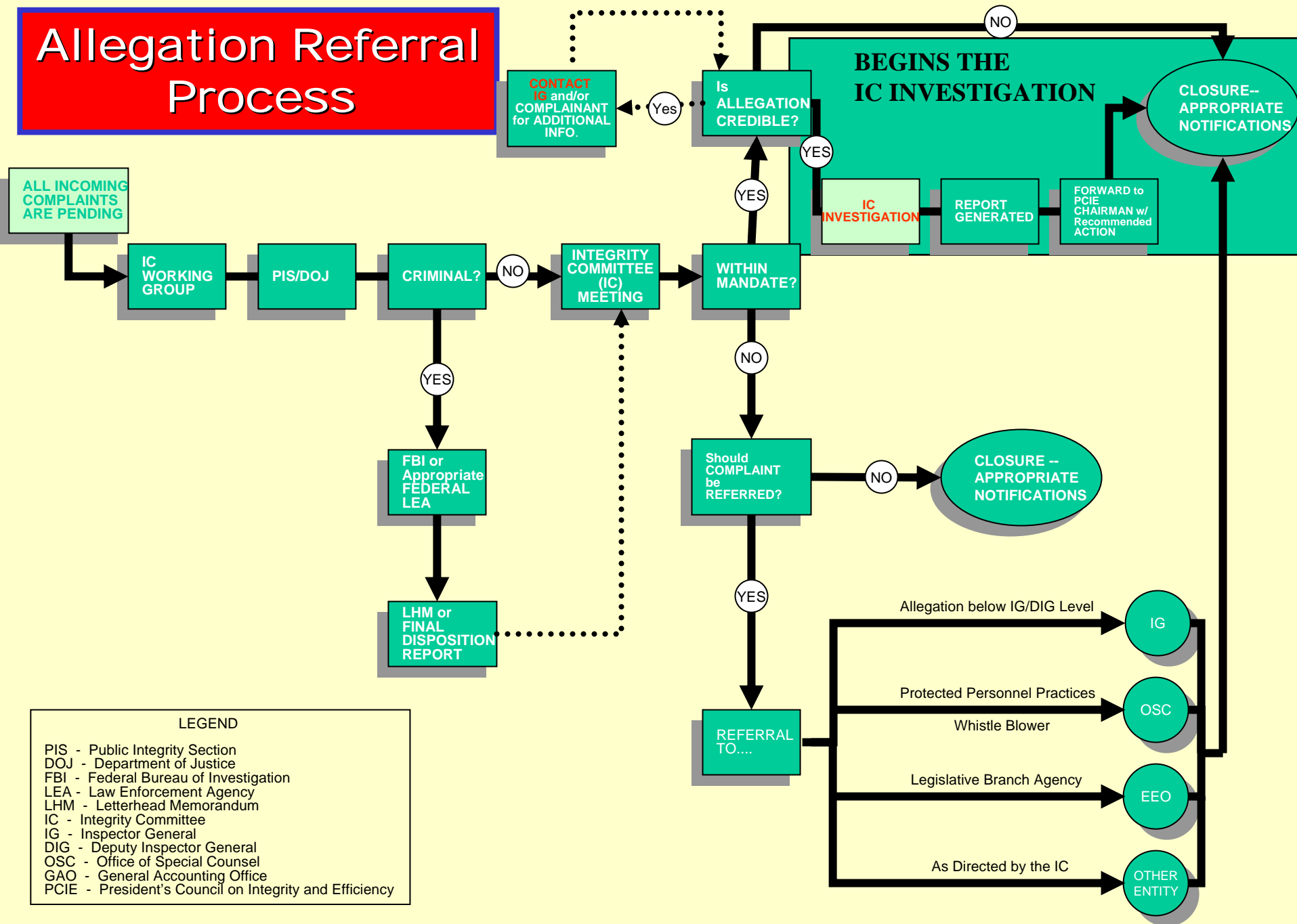
Who Serves on the IC?

- The FBI representative to the PCIE/ECIE serves as the Chairperson
- The Special Counsel of the Office of Special Counsel (OSC)
- The Director of the Office of Government Ethics (OGE)
- Three or more Inspectors General



Complaint Processing

Allegation Referral Process



Highlights of the Complaint Process

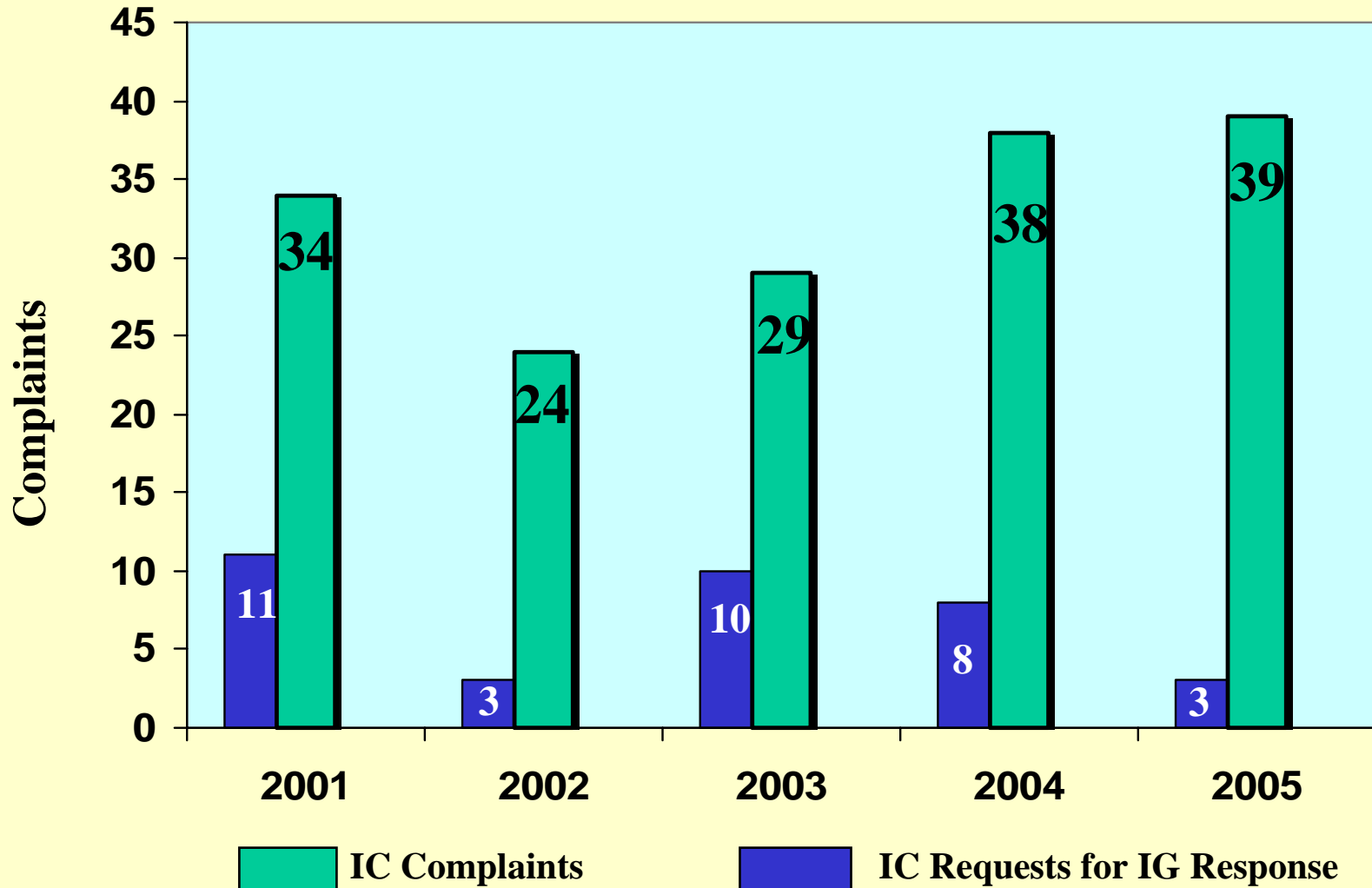
- *All* complaints received by the IC are assigned a sequential IC number for tracking purposes.
- *All* complaints are reviewed by the PIS, DOJ to determine if the allegation indicates a criminal violation of law.
- If PIS, DOJ determines the allegation is non-criminal, the complaint is returned for inclusion on the next IC meeting agenda.

Highlights of the Complaint Process

- The IC meets at least quarterly to review *all* complaints received and declined by PIS,DOJ. Until the IC meeting adjoins, all complaints are considered *pending*.
- The IC rigorously adheres to directives set under Executive Order 12933 which dictates that the IC may investigate *only* those allegations that directly involve the IG or senior staff member

Statistics

Integrity Committee Complaints and Requests for IG Responses



Total: 164 complaints

2001-2005

Number of IC Investigations

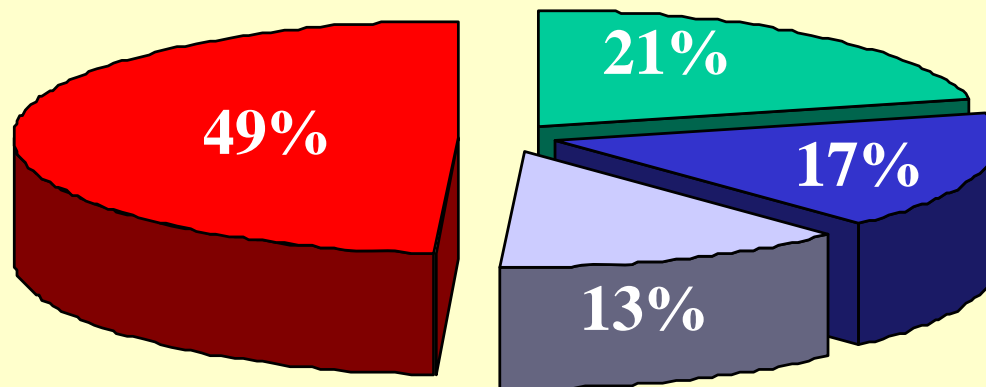
• 2001	1	Unsubstantiated
• 2002	2	Substantiated
• 2003	1	Pending
• 2004	1	Substantiated
	1	Unsubstantiated
• 2005	2	Pending
• 2006	1	<i>Pending *as of 5/1/06</i>

Key Points In Responding to IC Requests for Information

- **Be prompt in your response to the IC.**
- **Address each and every question providing details and/or documentation for each question.**
- **It is better to err on the side of providing more than less detail.**



Integrity Committee Allegation Types



■ Faulty Investigation

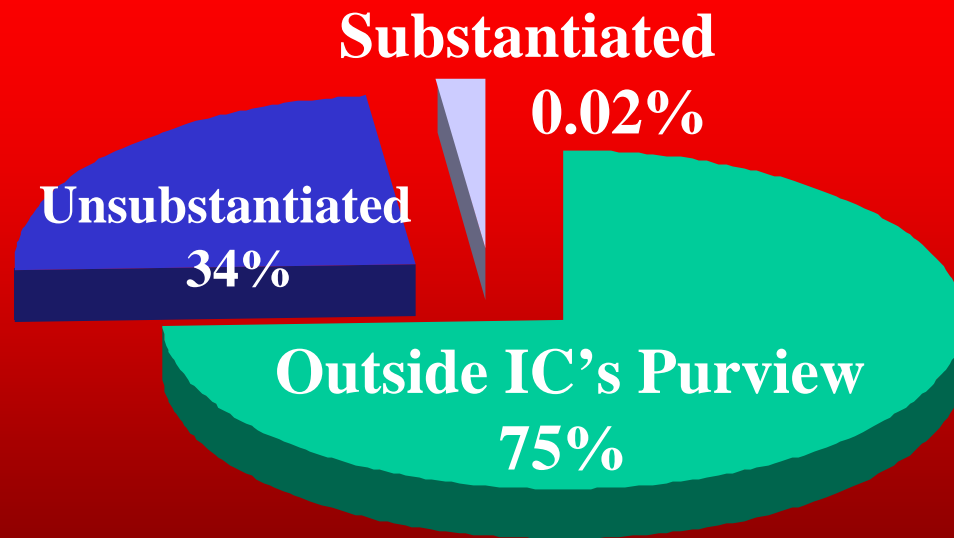
■ Failed to Investigate

■ Mismanagement

■ All Others

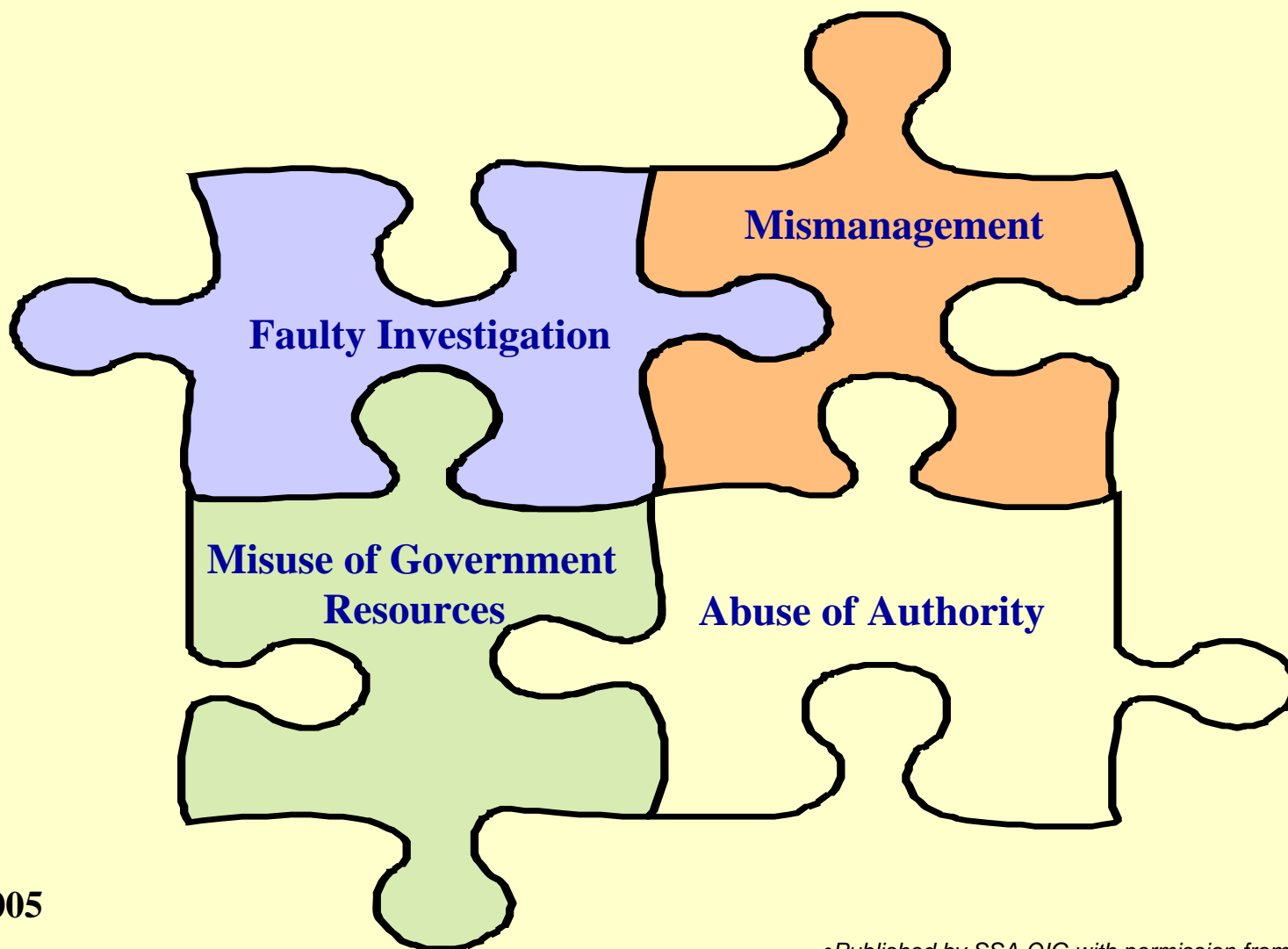
2001-2005

Integrity Committee Dispositions



2001-2005

IC Investigation Allegations

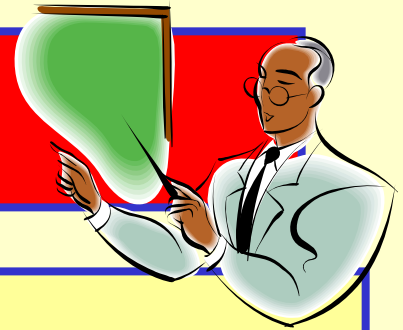


2003-2005

Examples of Allegations

- **Faulty Investigations:** An IG covered up the existence of an investigation to minimize the impact of the fraud and prevent embarrassment of the Agency. An IG failed to properly supervise and take action against investigative misconduct.
- **Mismanagement:** An IG is using funds to cover conference expenses for his entire staff to attend a week long holistic spa and relaxation seminar at a luxury spa retreat. An IG failed to establish investigative standards, proper qualification and training for OIG personnel.
- **Misuse of Government Resources:** An IG is using his office, staff and equipment to promote a charitable organizations fundraising efforts. An IG is using his government vehicle to travel between his vacation home and his residence.
- **Abuse of Authority:** An IG is coercing management in hiring friends and associates. An IG awarded management contracts in return for letters of references.

Best Practices



DO:

- Explain what you do and why,
- Ensure investigations, personnel actions, government resources (personnel, equipment, etc) and contracts are by the book,
- Get complaints to the right place (EEO, whistle blowing),
- Remember, you are being watched all of the time,

DON'T:

- Misuse government resources.

Questions for You

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Questions for You

- 1.) An IG receives a complaint that his SAC is harassing female employees. Should the IG refer the complaint to the IC?
- **NO.** Only complaints specifically against the IG or implicating an IG, or complaints where the IG determines that an objective internal review (or the appearance thereof) is not possible, should be referred to the IC. An IG may refer the allegation to either their EEO or the OSC and notify the IC of their actions.

Question for You:

Continued:

2). The IC receives a complaint that an IG is falsifying travel vouchers to conceal that family members are accompanying the IG on trips at government expenses. What actions does the IC take?

- As with all complaints, the IC would forward the complaint to the Public Integrity Section of DOJ for a criminal determination. If the PIS determines that the allegations warrants further criminal investigation, the FBI would receive the allegation and the IC would table the matter until the criminal investigation is complete. The IC will review the matter once the PIS declines criminal prosecution.**

Question for You:

Continued:

3.) What disciplinary actions can the IC take if wrongdoing is substantiated?

- **NONE. The IC is a FACT-FINDING committee only. The IC's findings are forwarded to the PCIE chairman for any further action the PCIE Chairman deems appropriate. The IC will, in certain cases, recommend to the PCIE Chairman that various actions be taken.**

Questions for You:

Continued:

- 4.) A Senator calls the IC Chairman with an allegation involving an IG. The Senator also states that he will be conducting his own investigation into the matter. What does the IC do?**
- First of all, EVERY complaint is handled in the same manner. The complaint must be in writing before it is processed. The Legislative Branch has the authority to investigate and if it appears that there may be a parallel investigation, the IC will coordinate with the Senator's office to avoid duplication.**

Questions for You:

Continued:

5). The IC receives a complaint against the IG Library of Congress, which alleges that the IG has withheld pertinent information from a Report of Investigation and resulted in a faulty investigation. What actions does the IC take?

The IC will notify the complaint that the IC does not have jurisdiction, because the Library of Congress is NOT a member of the President's or Executive Councils on Integrity and Efficiency and, therefore, does not fall with the purview of the IC. The IC will refer the allegation to the Librarian of Congress for appropriate action.

Questions for You:

Continued:

6.) An IG has referred allegations to the IC that his office did not conduct a complete and unbiased investigation. What does the IC do?

- The IG may refer the allegations to the IC, but, unless the allegations specifically implicate the IG or senior staff member, the IC would refer allegation BACK to the IG because it would be outside of the IC's purview. A better choice would be to contact another OIG office to conduct a review of the allegations. IG's need to work together to avoid any appearance of partiality or biased investigative techniques.**

Questions for You:

Continued:

7.) Does the IC notify an IG upon the opening of a case?

- Usually, an IG is not notified upon the initiation of a case, unless the case was referred by the IG. Generally, IG's are notified upon the disposition of IC cases.**

Conclusion

- The IC serves an important function to the public and IG community by ensuring that allegations against the IGs receive fair and timely review.
- The IC has established procedures to ensure complaints are processed in an efficient and timely manner and continues to strive to improve it's operations.
- The IC has investigated and continues to investigate significant allegations against IGs and stands ready to address new allegations.

End of Presentation